

1 LATHAM & WATKINS LLP
2 Daniel P. Brunton (Bar No. 218615)
3 Email: daniel.brunton@lw.com
4 12670 High Bluff Drive
5 San Diego, CA 92130
6 Tel.: (858) 523-5400
7 Fax: (858) 523-5450

8 Michael G. Romey (Bar No. 137993)
9 Email: michael.romeys@lw.com
10 355 South Grand Avenue, Suite 100
11 Los Angeles, CA 90071-1560
12 Tel.: (213) 485-1234
13 Fax: (213) 891-8763

14 Janice M. Schneider (*Pro Hac Vice*)
15 Email: janice.schneider@lw.com
16 Devin M. O'Connor (*Pro Hac Vice*)
17 Email: devin.o'connor@lw.com
18 555 Eleventh Street, NW, Suite 1000
19 Washington, D.C. 20004-1304
20 Tel.: (202) 637-2200
21 Fax: (202) 637-2201

22 *Attorneys for Intervenor-Defendant*
23 *Sable Offshore Corp.*

24 **UNITED STATES DISTRICT COURT**
25 **CENTRAL DISTRICT OF CALIFORNIA**
26 **WESTERN DIVISION**

27 CENTER FOR BIOLOGICAL
28 DIVERSITY, et al.,

1 Plaintiffs,

2 v.

3 DOUG BURGUM, et al.,

4 Defendants,

5 and

6 SABLE OFFSHORE CORP.,

7 *Intervenor-Defendant.*

8 CASE NO. 2:24-cv-05459-MWC-MAA

9 **SABLE OFFSHORE CORP.'S**
10 **RESPONSE TO FEDERAL**
11 **DEFENDANTS' NOTICE OF**
12 **RECENT DEVELOPMENTS**

13 Judge: Hon. Michelle Williams Court
14 Courtroom: 6A

1 Sable Offshore Corp. (“Sable”) has reviewed the Notice of Recent
2 Developments filed by Federal Defendants on May 23, 2025. It appears that the
3 Parties had a misunderstanding regarding the scope of the Office of State Fire
4 Marshal (“OSFM”) approval under the Plains Consent Decree. The Consent
5 Decree requires OSFM approval of restart for pipeline segments Lines 324 and 325
6 (formerly known as Lines 901 and 903) prior to returning Lines 324 and 325 to
7 service. Sable is following that requirement. (A copy of the Consent Decree,
8 including a map showing the location of Lines 901 and 903 – which are onshore –
9 is in Appendix A of the Consent Decree, available at:

10 <https://www.epa.gov/sites/default/files/2020-03/documents/plainsallamericanpipelinelp.pdf>.) The pipelines from the Santa
11 Ynez Unit Platforms to the Las Flores Canyon onshore processing facilities,
12 including the storage tanks, which are operationally required to be filled before
13 using Lines 324 and 325, are not covered by this Consent Decree requirement for
14 OSFM approval. As a result, statements made during briefing on the Federal
15 Defendants’ Motion for Voluntary Remand, including those outlined in Federal
16 Defendant’s filing and by Ms. Schneider for Sable at the hearing on March 21,
17 2025 regarding the steps necessary for production from the Santa Ynez Unit
18 inadvertently failed to take this nuance into account. On April 16, 2025, after the
19 hearing on the Federal Defendants’ Motion for Voluntary Remand, BSEE provided
20 a pre-production letter to Sable stating that all safety systems on Platform
21 Harmony have been successfully tested, as required by 30 C.F.R. § 250.800,
22 allowing Sable to return the facility to production.

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1 Dated: May 23, 2025

Respectfully submitted,

2 LATHAM & WATKINS LLP

3 By: /s/ Daniel P. Brunton

4 Daniel P. Brunton (Bar No. 218615)
5 Email: daniel.brunton@lw.com
6 12670 High Bluff Drive
San Diego, CA 92130
Tel.: (858) 523-5400
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